



BP EXPLORATION

BP Exploration (Alaska) Inc.
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Anchorage, Alaska 99519-6612
(907) 561-5111

By Facsimile

December 13, 1996

Mr. John Keenan
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA 98101

NSPS Subpart GG Fuel Sulfur Performance Tests
for Emergency Gas Turbines

Dear Mr. Keenan:

This letter is in response to our meeting with you in Seattle on September 20, 1996. Among several issues brought to your attention in the meeting, BP Exploration (Alaska) Inc. (BPX) requested the EPA waive fuel sulfur performance tests and allow monthly liquid fuel sulfur monitoring for three emergency gas turbines operated by BPX. These issues were outlined in our previous letter to Ms. Bonnie Thie dated September 16, 1996.

In our meeting, you agreed that the current monthly liquid fuel sulfur monitoring which BPX conducts will fulfill the fuel monitoring provisions of Subpart GG. As we explained, this monitoring is currently done under our existing Air Quality Control Permit to Operate through the use of a monthly analysis conducted by our fuel supplier (ARCO Crude Topping Unit).

Regarding our request to waive Subpart GG performance testing, you indicated that with respect to the applicable sulfur standards in the NSPS, the performance test may be either an emissions test or sulfur analysis of the fuel. It was agreed that BPX would elect to conduct the fuel analysis rather than an emissions test. You requested that BPX submit to your attention the results of the most recent liquid fuel sulfur analysis to meet the requirements of the performance test. Please find attached copies of the sulfur analysis data.

The analysis is representative of the fuel burned in the following turbines:

Prudhoe Bay Unit-Gathering Center One (GC1)
Prudhoe Bay Unit-Gathering Center Two (GC2)
Prudhoe Bay Unit-Gathering Center Three (GC3)

Allison Turbine Tag No. GTRB-51-8001
Allison Turbine Tag No. GTRB-02-8001
Allison Turbine Tag No. GTRB-03-8001

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John K

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The sulfur analysis data is summarized in the table below:

Sample Location	Sulfur (weight percent)
GC1, T-51-8008	0.17
GC2, SK318	0.13
GC3, SK318	0.19

BPX would appreciate your written response indicating this information fulfills the performance test requirements for Subpart GG with respect to fuel sulfur and that you continue to concur that monthly liquid fuel sulfur content sampling will also meet the monitoring requirements of the NSPS at 60.334(b). Please call Alison Cooke at (907) 564-4838 if you have any questions or require additional information.

Sincerely,



Steven D. Taylor, Manager
Environmental & Regulatory Affairs

SDT/ADC

Attachments

cc: B. Thie, EPA Region 10, Seattle
R. Nye, EPA Region 10, Seattle
A. Bohn, ADEC, Anchorage



CT&E Environmental Services Inc.

CT&E Ref.# 966151003
Client Name Area Ak-Prudhoe Bay
Project Name/# Diesel Samples
Client Sample ID T-51-8008 GC-1
Matrix Oil
Ordered By
PWSID

Client PO#
Printed Date/Time 12/11/96 11:10
Collected Date/Time 11/06/96 00:00
Received Date/Time 11/14/96 09:30
Technical Director: Stephen C. Eds

Released By *Sharon Patton*

Sample Remarks:

Parameter	Results	POL	Units	Method	Allowable Limits	Prep Date	Analysis Date	Init
Total Sulfur	0.17	0.0100	%	ASTM D-129		11/22/96	11/22/96	DNT



CT&E Environmental Services Inc.

CT&E Ref.# 966151002
Client Name Arco Ak-Prudhoe Bay
Project Name/# Diesel Samples
Client Sample ID GC-2 SK318
Matrix Oil
Ordered By
PWSID

Client PO#
Printed Date/Time 12/11/96 11:10
Collected Date/Time 11/06/96 00:00
Received Date/Time 11/14/96 09:30
Technical Director: Stephen C. Ede

Released By *Sharon F. Eaton*

Sample Remarks:

Parameter	Results	PQL	Units	Method	Allowable Limits	Prep Date	Analysis Date	Intc
Total Sulfur	0.13	0.0100	%	ASTM D-129		11/22/96	11/22/96 DMT	



CT&E Environmental Services Inc.

CT&E Ref.# 966151001
Client Name Arco Ak-Prudhoe Bay
Project Name/# Diesel Samples
Client Sample ID GC-3 SK318
Matrix Oil
Ordered By
PWSID

Client PO#
Printed Date/Time 12/11/96 11:10
Collected Date/Time 11/06/96 00:00
Received Date/Time 11/14/96 09:30
Technical Director: Stephen C. Eide

Released By *Sharon Patton*

Sample Remarks:

Parameter	Results	PQL	Units	Method	Allowable Limits	Prep Date	Analysis Date	Init
Total Sulfur	0.19	0.0100	%	ASTM D-129		11/22/96	11/22/96	DHT